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Ultimate Fighting Championship and UFC
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17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19 Cung Le, Nathan Quarry, Jon Fitch, Brandon
20 Vera, Luis Javier Vazquez, and Kyle Kingsbury,
on behalf of themselves and all others similarly
21 situated,

22 Plaintiffs,

23 v.

24 Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

25 Defendant.
26
27
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No.: 2:15-cv-01045-RFB-(PAL)

**DECLARATION OF STACEY K.
GRIGSBY IN SUPPORT OF JOINT
MOTION TO CONDITIONALLY
FILE UNDER SEAL PLAINTIFFS'
REPLY STATEMENT REGARDING
RULE 23 STANDARDS (ECF NO.
646) AND PLAINTIFFS' RESPONSE
TO ZUFFA, LLC'S PROPOSAL
REGARDING THE TREATMENT OF
PROTECTED MATERIAL FOR THE
EVIDENTIARY HEARING ON
CLASS CERTIFICATION (ECF NO.
639)**

1 I, Stacey K. Grigsby, declare as follows:

2 1. I am a member in good standing of the bar of the District of Columbia and the bar of
3 the State of New York. I am admitted *pro hac vice* to practice before this Court. I am a Partner in
4 the law firm Boies Schiller Flexner LLP (“BSF”), counsel for Zuffa, LLC (“Zuffa”) in the above
5 captioned action in the U.S. District Court for the District of Nevada, *Le et al. v. Zuffa, LLC*, No.
6 2:15-cv-01045-RFP-PAL.

7 2. I make this declaration in support of the Joint Motion to Conditionally File Under
8 Seal Plaintiffs’ Reply Statement Regarding Rule 23 Standards and Plaintiffs’ Response to Zuffa,
9 LLC’s Proposal Regarding the Treatment of Protected Material for the Evidentiary Hearing on Class
10 Certification. Based on my personal experience, knowledge, and review of the files, records, and
11 communications in this case, I have personal knowledge of the facts set forth in this Declaration and,
12 if called to testify, could and would testify competently to those facts under oath.

13 3. Exhibit A to this Declaration is a true and correct copy of Plaintiffs’ Reply Statement
14 Regarding Rule 23 Standards with fewer redactions than the publicly filed version of that document,
15 initially filed as ECF No. 639.

16 4. Exhibit B to this Declaration is a true and correct copy of Plaintiffs’ Response to
17 Zuffa, LLC’s Proposal Regarding the Treatment of Protected Material for the Evidentiary Hearing
18 on Class Certification with fewer redactions than the publicly filed version of that document, initially
19 filed at ECF No. 640.

20
21 I declare under penalty of perjury under the laws of the United States of America that the
22 foregoing facts are true and correct. Executed this 28th day of January, 2019 in Washington, DC.

23 /s/ Stacey K. Grigsby

24 Stacey K. Grigsby